

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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SUSAN MOUW, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

NATIONAL AUTO DIVISION,  
LLC, a New Jersey limited liability  
company,

Defendant.

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:  
: Civil Action No. 16-cv-2947-AET-DEA  
:  
:  
: Hon. Anne E. Thompson, U.S.D.J.

**PLAINTIFF'S NOTICE OF  
MOTION FOR LEAVE TO  
FILE FIRST AMENDED  
CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that Plaintiff Susan Mouw ("Plaintiff" or "Mouw"), by and through her undersigned attorneys, on May 1, 2017, or as soon thereafter as counsel may be heard, shall move before the Honorable Anne Thompson at the Clarkson F. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 for leave to file a First Amended Class Action Complaint.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiff shall rely on her Memorandum of Law and accompanying exhibits, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed order is enclosed

herewith.

Dated: April 3, 2017

**SUSAN MOUW**, individually and on behalf  
of all others similarly situated,

By: /s Stefan Coleman  
One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

I certify that on April 3, 2017, I served this document on all counsel of record by filing such document with the Court using the Court's electronic filing system.

/s/ Stefan Coleman